

1 MICHAEL A. JACOBS (CA SBN 111664)  
MJacobs@mofo.com  
2 ARTURO J. GONZÁLEZ (CA SBN 121490)  
AGonzalez@mofo.com  
3 ERIC A. TATE (CA SBN 178719)  
ETate@mofo.com  
4 MORRISON & FOERSTER LLP  
425 Market Street  
5 San Francisco, California 94105-2482  
Telephone: 415.268.7000  
6 Facsimile: 415.268.7522  
  
7 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.,  
8 OTTOMOTTO LLC, and OTTO TRUCKING LLC

9 KAREN L. DUNN (*Pro Hac Vice*)  
kdunn@bsfllp.com  
10 HAMISH P.M. HUME (*Pro Hac Vice*)  
hhume@bsfllp.com  
11 BOIES SCHILLER FLEXNER LLP  
1401 New York Avenue, N.W.  
12 Washington DC 20005  
Telephone: 202.237.2727  
13 Facsimile: 202.237.6131

14 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
15 and OTTOMOTTO LLC

16 UNITED STATES DISTRICT COURT  
17 NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION

19 WAYMO LLC,  
20 Plaintiff,  
21 v.  
22 UBER TECHNOLOGIES, INC.,  
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
24 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE  
YANG IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
PORTIONS OF THEIR STATEMENT  
IN RESPONSE TO PARAGRAPH 3  
OF ORDER RE EARLY MOTIONS  
IN LIMINE AND RELATED  
MATTERS (DKT. 784)**

Trial Date: October 10, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this  
3 declaration based upon matters within my own personal knowledge and if called as a witness, I  
4 could and would competently testify to the matters set forth herein. I make this declaration in  
5 support of Defendants' Administrative Motion to File Under Seal Portions of their Statement in  
6 Response to Paragraph 3 of Order Re Early Motions in Limine and Related Matters (Dkt. 784).

7 2. I have reviewed the following documents and confirmed that the material  
8 identified below merits sealing:

Document	Portions to Be Filed Under Seal
Statement in Response to Paragraph 3 of Order Re Early Motions in Limine and Related Matters ("Statement") (Dkt. 784)	Highlighted Portions

13 3. The highlighted portions of this Statement were designated "Highly Confidential –  
14 Attorneys' Eyes Only" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model  
15 Protective Order ("Protective Order"), which the parties have agreed govern this case (Transcript  
16 of 3/16/2017 Hearing, page 6). Defendants take no stance on whether this material merits sealing,  
17 but are required to file this material under seal in accordance with Paragraph 14.4 of the  
18 Protective Order.

19 4. Defendants' request to seal is narrowly tailored to those portions of their Statement  
20 that it is required to file under seal.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is  
22 true and correct. Executed this 7th day of July, 2017, in Washington, District of Columbia.

23  
24 /s/ Michelle Yang

Michelle Yang

**ATTESTATION OF E-FILED SIGNATURE**

I, Karen Dunn, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Camila Tapernoux has concurred in this filing.

Dated: July 6, 2017

/s/ Karen Dunn

Karen Dunn